

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KING COUNTY, WASHINGTON, et al.,	:	Master File No. 1:09-cv-08387-SAS
Individually and on Behalf of All Others	:	(Consolidated)
Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiffs,	:	
	:	CORRECTED DECLARATION OF DANIEL
vs.	:	S. DROSMAN IN SUPPORT OF
	:	PLAINTIFFS' OMNIBUS MEMORANDUM
IKB DEUTSCHE INDUSTRIEBANK AG, et	:	OF LAW IN SUPPORT OF THEIR
al.,	:	OPPOSITION TO DEFENDANTS'
	:	MOTIONS FOR SUMMARY JUDGMENT
Defendants.	:	PURSUANT TO FEDERAL RULE OF
<hr/>	X	CIVIL PROCEDURE 56(c) AND
		PLAINTIFFS' RESPONSE TO
		DEFENDANT FITCH, INC.'S STATEMENT
		OF UNDISPUTED MATERIAL FACTS
		PURSUANT TO LOCAL RULE 56.1

I, Daniel S. Drosman, declare as follows:

1. I am an attorney admitted to practice before this Court, and I am a partner of the law firm of Robbins Geller Rudman & Dowd LLP, counsel for plaintiffs in the above-captioned matter. I submit this Declaration in support of Plaintiffs' Omnibus Memorandum of Law in Support of Their Opposition to Defendants' Motions for Summary Judgment Pursuant to Federal Rule of Civil Procedure 56(c) and Plaintiffs' Response to Defendant Fitch, Inc.'s Statement of Undisputed Material Facts Pursuant to Local Rule 56.1.

2. Attached are true and correct copies of the following documents:

TAB	Document Description
Tab 1	Plaintiffs' Deposition Exhibit 280 (Guadagnuolo, November 17, 2011)
Tab 2	<i>Abu Dhabi Commercial Bank v. Morgan Stanley</i> , No. 1:08-cv-750-SAS (S.D.N.Y.) ("ADCB") Plaintiffs' Deposition Exhibit 689 (November 1, 2011)
Tab 3	ADCB Plaintiffs' Deposition Exhibit 339 (Tabe, March 9, 2011)
Tab 4	Plaintiffs' Deposition Exhibit 350 (Katugampola, November 18, 2011)
Tab 5	S&P-IKB 0013239
Tab 6	S&P-IKB 0082508-09
Tab 7	MDYS RHNB 012021-27
Tab 8	Plaintiffs' Deposition Exhibit 278 (Guadagnuolo, November 17, 2011)
Tab 9	Excerpts from the Deposition Transcript of Lapo Guadagnuolo taken on November 17, 2011
Tab 10	S&P-IKB 0061760-62
Tab 11	Excerpts from the Deposition Transcript of David Rosa taken on November 29, 2011
Tab 12	Plaintiffs' Deposition Exhibit 378 (Rosa, November 29, 2011)
Tab 13	FITCH-RHINE 00047584-601
Tab 14	Excerpts from the Deposition Transcript of Glenn Moore taken on November 30, 2011
Tab 15	S&P-ADCB 0001196-321
Tab 16	ADCB Plaintiffs' Deposition Exhibit 279 (Drennan, March 1, 2011)

Tab 17	MS_000432583
Tab 18	Excerpts from the Deposition Transcript of Gregg Drennan taken on March 1, 2011 in <i>ADCB</i>
Tab 19	<i>ADCB</i> Plaintiffs' Deposition Exhibit 256 (Drennan, February 28, 2011)
Tab 20	Plaintiffs' Deposition Exhibit 259 (Ryan, November 16, 2011)
Tab 21	S&P-IKB 0009486-87
Tab 22	Plaintiffs' Deposition Exhibit 435 (Wallis, November 30, 2011)
Tab 23	Plaintiffs' Deposition Exhibit 227 (Rhode, November 10, 2011)
Tab 24	Plaintiffs' Deposition Exhibit 349 (Katugampola, November 18, 2011)
Tab 25	BNYM10185368-549
Tab 26	S&P-IKB 0086474-565
Tab 27	Plaintiffs' Deposition Exhibit 383 (Rosa, November 29, 2011)
Tab 28	Plaintiffs' Deposition Exhibit 379 (Rosa, November 29, 2011)
Tab 29	IKB000143917-18
Tab 30	IKB000850390-92
Tab 31	IKB000850437-39
Tab 32	IKB000916050-53
Tab 33	Plaintiffs' Deposition Exhibit 392 (Moore, November 30, 2011)
Tab 34	Plaintiffs' Deposition Exhibit 393 (Moore, November 30, 2011)
Tab 35	Plaintiffs' Deposition Exhibit 394 (Moore, November 30, 2011)
Tab 36	S&P-IKB 0030071-75
Tab 37	Plaintiffs' Deposition Exhibit 387 (Moore, November 30, 2011)
Tab 38	MDYS RHNB 009774-75
Tab 39	Excerpts from the Exhibits to the U.S. Senate Permanent Subcommittee on Investigations, entitled <i>Wall Street and the Financial Crisis: Anatomy of a Financial Collapse</i>
Tab 40	<i>ADCB</i> Plaintiffs' Deposition Exhibit 432 (Fons, April 18, 2011)
Tab 41	<i>ADCB</i> Plaintiffs' Deposition Exhibit 561 (Wong, April 25, 2011)
Tab 42	Plaintiffs' Deposition Exhibit 157 (Anderberg, October 21, 2011)
Tab 43	S&P-IKB 0775675-77
Tab 44	Plaintiffs' Deposition Exhibit 159 (Anderberg, October 21, 2011)
Tab 45	<i>ADCB</i> Plaintiffs' Deposition Exhibit 148 (Guadagnuolo, January 13, 2011)

Tab 46	<i>ADCB</i> Plaintiffs' Deposition Exhibit 298 (Inglis, March 4, 2011)
Tab 47	<i>ADCB</i> Plaintiffs' Deposition Exhibit 190 (Gilkes, January 20, 2011)
Tab 48	<i>ADCB</i> Plaintiffs' Deposition Exhibit 195 (Gilkes, January 20, 2011)
Tab 49	<i>ADCB</i> Plaintiffs' Deposition Exhibit 189 (Gilkes, January 20, 2011)
Tab 50	<i>ADCB</i> Plaintiffs' Deposition Exhibit 154 (Guadagnuolo, January 13, 2011)
Tab 51	Excerpts from the Deposition Transcript of Frank L. Raiter taken on October 29, 2010 in <i>ADCB</i>
Tab 52	<i>ADCB</i> Plaintiffs' Deposition Exhibit 501 (Jordan, April 20, 2011)
Tab 53	S&P-ADCB 0384639
Tab 54	Plaintiffs' Deposition Exhibit 290 (Guadagnuolo, November 17, 2011)
Tab 55	Plaintiffs' Deposition Exhibit 292 (Guadagnuolo, November 17, 2011)
Tab 56	<i>ADCB</i> Plaintiffs' Deposition Exhibit 417 (Gillis, April 15, 2011)
Tab 57	Excerpts from the Deposition Transcript of Thomas Gillis taken on April 15, 2011 in <i>ADCB</i>
Tab 58	<i>ADCB</i> Plaintiffs' Deposition Exhibit 351 (Khakee, March 16, 2011)
Tab 59	S&P-IKB 1967291
Tab 60	<i>ADCB</i> Plaintiffs' Deposition Exhibit 210 (Gilkes, January 21, 2011)
Tab 61	Excerpts from the Deposition Transcript of Kai Gilkes taken on January 21, 2011
Tab 62	S&P-IKB 1886349-89
Tab 63	S&P-IKB 0745395-410
Tab 64	Plaintiffs' Deposition Exhibit 293 (Guadagnuolo, November 17, 2011)
Tab 65	<i>ADCB</i> Plaintiffs' Deposition Exhibit 49 (Rosa, November 18, 2009)
Tab 66	<i>ADCB</i> Plaintiffs' Deposition Exhibit 598 (Clarkson, May 26, 2011)
Tab 67	<i>ADCB</i> Plaintiffs' Deposition Exhibit 266 (Drennan, March 1, 2011)
Tab 68	Plaintiffs' Deposition Exhibit 375 (Rosa, November 29, 2011)
Tab 69	<i>ADCB</i> Plaintiffs' Deposition Exhibit 343 (Michalek, March 12, 2011)
Tab 70	Excerpts from the Deposition Transcript of Richard Michalek taken on March 12, 2011 in <i>ADCB</i>
Tab 71	William J. Harrington, "Comment on SEC Proposed Rules for Nationally Recognized Statistical Rating Organizations", File No. S7-18-11 (August 8, 2011)
Tab 72	MDYS ADCB 294189-95

Tab 73	<i>ADCB</i> Plaintiffs' Deposition Exhibit 587 (Clarkson, May 26, 2011)
Tab 74	MDYS ADCB 294196-97
Tab 75	MDYS ADCB 080002-03
Tab 76	Plaintiffs' Deposition Exhibit 374 (Rosa, November 29, 2011)
Tab 77	MS_RHI_000094757
Tab 78	Plaintiffs' Deposition Exhibit 86, 86-T (Bauknecht, October 13, 2011)
Tab 79	Plaintiffs' Deposition Exhibit 44 (De Haan, September 22, 2011)
Tab 80	Excerpts from the Deposition Transcript of Klauss Bauknecht taken on October 13, 2011
Tab 81	<i>ADCB</i> Plaintiffs' Deposition Exhibit 324 (Tabe, March 9, 2011)
Tab 82	MDYS ADCB 1096861
Tab 83	MDYS ADCB 1235283
Tab 84	<i>ADCB</i> Plaintiffs' Deposition Exhibit 592 (Clarkson, May 26, 2011)
Tab 85	MDYS ADCB 368265
Tab 86	Plaintiffs' Deposition Exhibit 373 (Rosa, November 29, 2011)
Tab 87	<i>ADCB</i> Plaintiffs' Deposition Exhibit 382 (Rosa, April 5, 2011)
Tab 88	Excerpts from the Deposition Transcript of David Rosa taken on November 18, 2009 in <i>ADCB</i>
Tab 89	Excerpts from the Deposition Transcript of Henry Tabe taken on March 8, 2011 in <i>ADCB</i>
Tab 90	<i>ADCB</i> Plaintiffs' Deposition Exhibit 581 (Clarkson, May 26, 2011)
Tab 91	Plaintiffs' Deposition Exhibit 382 (Rosa, November 29, 2011)
Tab 92	Plaintiffs' Deposition Exhibit 384 (Rosa, November 29, 2011)
Tab 93	FITCH-RHINE 00128249-56
Tab 94	Plaintiffs' Deposition Exhibit 458 (Bund, March 21, 2012)
Tab 95	Excerpts from the Deposition Transcript of Stefan Bund taken on March 21, 2012
Tab 96	FITCH-RHINE 00015585
Tab 97	Plaintiffs' Deposition Exhibit 391 (Moore, November 30, 2011)
Tab 98	FITCH-RHINE 00052882-83
Tab 99	FITCH-RHINE 00133737-49
Tab 100	Plaintiffs' Deposition Exhibit 403 (Moore, November 30, 2011)
Tab 101	Plaintiffs' Deposition Exhibit 398 (Moore, November 30, 2011)

Tab 102	FITCH-RHINE 00001460-77
Tab 103	<i>ADCB</i> Plaintiffs' Deposition Exhibit 75 (Raiter, October, 28, 2010)
Tab 104	Excerpts from the Deposition Transcript of Lapo Guadagnuolo taken on November 14, 2011
Tab 105	Excerpts from the Deposition Transcript of Kevin Duignan taken on November 21, 2011
Tab 106	Excerpts from the Deposition Transcript of David Rosa taken on April 6, 2011 in <i>ADCB</i>
Tab 107	Transcript of The McGraw Hill Companies at Credit Suisse Global Services Conference (Main Session) (March 13, 2006)
Tab 108	<i>ADCB</i> Plaintiffs' Deposition Exhibit 77 (Raiter, October 28, 2010)
Tab 109	Excerpts from the Deposition Transcript of Frank L. Raiter taken on October 28, 2010
Tab 110	<i>ADCB</i> Plaintiffs' Deposition Exhibit 84 (Raiter, October 28, 2010)
Tab 111	<i>ADCB</i> Plaintiffs' Deposition Exhibit 201 (Gilkes, January 21, 2011)
Tab 112	<i>ADCB</i> Plaintiffs' Deposition Exhibit 203 (Gilkes, January 21, 2011)
Tab 113	<i>ADCB</i> Plaintiffs' Deposition Exhibit 211 (Gilkes, January 21, 2011)
Tab 114	<i>ADCB</i> Plaintiffs' Deposition Exhibit 561(Wong, April 25, 2011)
Tab 115	<i>ADCB</i> Plaintiffs' Deposition Exhibit 579 (Scott, April 28, 2011)
Tab 116	<i>ADCB</i> Plaintiffs' Deposition Exhibit 241 (Kolchinsky, February 18, 2011)
Tab 117	<i>ADCB</i> Plaintiffs' Deposition Exhibit 179 (Guadagnuolo, January 14, 2011)
Tab 118	<i>ADCB</i> Plaintiffs' Deposition Exhibit 313 (Tabe, March 8, 2011)
Tab 119	<i>ADCB</i> Plaintiffs' Deposition Exhibit 600 (Clarkson, May 26, 2011)
Tab 120	Excerpts from the Deposition Transcript of Brian Clarkson taken on May 26, 2011
Tab 121	Excerpts from the Deposition Transcript of Ilya Kolchinsky taken on February 28, 2011 in <i>ADCB</i>
Tab 122	<i>ADCB</i> Plaintiffs' Deposition Exhibit 434 (Fons, April 18, 2011)
Tab 123	Excerpts from the Deposition Transcript of Jerome S. Fons taken on April 18, 2011 in <i>ADCB</i>
Tab 124	<i>ADCB</i> Plaintiffs' Deposition Exhibit 608 (Kornfield, June 28, 2011)
Tab 125	<i>ADCB</i> Plaintiffs' Deposition Exhibit 591 (Clarkson, May 26, 2011)
Tab 126	<i>ADCB</i> Plaintiffs' Deposition Exhibit 558 (Wong, April 25, 2011)

Tab 127	IKB002487146-48
Tab 128	IKB002487149-57
Tab 129	IKB002487158-59
Tab 130	S&P-ADCB 0532876-91
Tab 131	<i>ADCB</i> Plaintiffs' Deposition Exhibit 676 (Kirnon, July 28, 2011)
Tab 132	MDYS ADCB 992546-626
Tab 133	CRDT_RTG_EXH_0000015-25
Tab 134	MS_000007149
Tab 135	FI-ABUDHABI 00038-62
Tab 136	Plaintiffs' Deposition Exhibit 355 (Duignan, November 21, 2011)
Tab 137	Plaintiffs' Deposition Exhibit 451 (Ottley, November 30, 2011)
Tab 138	Plaintiffs' Deposition Exhibit 449 (Bund, March 21, 2012)
Tab 139	Defendants' Deposition Exhibit 34 (Pinkus, October 20, 2011)
Tab 140	FITCH-RHINE 00057448-49
Tab 141	Excerpts from the Deposition Transcript of Kai Gilkes taken on January 20, 2011 in <i>ADCB</i>
Tab 142	<i>ADCB</i> Plaintiffs' Deposition Exhibit 588 (Clarkson, May 26, 2011)
Tab 143	Excerpts from the Deposition Transcript of Navindu Katugampola taken on November 17, 2011
Tab 144	MS_RHI_000258501-03
Tab 145	MS_RHI_000306687-88
Tab 146	MS_RHI_000098527
Tab 147	Plaintiffs' Deposition Exhibit 411 (Drennan, December 8, 2011)
Tab 148	S&P-IKB 0012243-44
Tab 149	IKB 000657089-90
Tab 150	Plaintiffs' Deposition Exhibit 421 (Drennan, December 8, 2011)
Tab 151	Plaintiffs' Deposition Exhibit 346 (Katugampola, November 18, 2011)
Tab 152	Plaintiffs' Deposition Exhibit 428 (Drennan, December 8, 2011)
Tab 153	Plaintiffs' Deposition Exhibit 429 (Drennan, December 8, 2011)
Tab 154	MDYS RHNB 041361-534
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Tab 156	MS_RHI_000249219-20
Tab 157	MS_RHI_000296478-79
Tab 158	Plaintiffs' Deposition Exhibit 338 (Katugampola, November 17, 2011)
Tab 159	MS_000622539-41
Tab 160	MS_RHI_000016356-59
Tab 161	Plaintiffs' Deposition Exhibit 337 (Katugampola, November 17, 2011)
Tab 162	MS_000748972-74
Tab 163	Plaintiffs' Deposition Exhibit 339 (Katugampola, November 17, 2011)
Tab 164	Plaintiffs' Deposition Exhibit 339A (Katugampola, November 18, 2011)
Tab 165	Plaintiffs' Deposition Exhibit 340 (Katugampola, November 17, 2011)
Tab 166	Plaintiffs' Deposition Exhibit 345 (Katugampola, November 18, 2011)
Tab 167	MS_RHI_003065396-98
Tab 168	MS_RHI_001258129-57
Tab 169	MS_RHI_000592703-48
Tab 170	Excerpts from the Deposition Transcript of Anton Peterson taken on November 22, 2011 in <i>ADCB</i>
Tab 171	MS_RHI_000658064
Tab 172	MS_RHI_001756493-95
Tab 173	<i>ADCB</i> Plaintiffs' Deposition Exhibit 700 (Peterson, November 22, 2011)
Tab 174	<i>ADCB</i> Plaintiffs' Deposition Exhibit 701 (Peterson, November 22, 2011)
Tab 175	Exhibit 6 to September 7, 2011 letter to the Court in <i>ADCB</i>
Tab 176	<i>ADCB</i> Plaintiffs' Deposition Exhibit 699 (Peterson, November 22, 2011)
Tab 177	MS_001352153
Tab 178	Exhibit 7 to September 7, 2011 letter to the Court in <i>ADCB</i>
Tab 179	MS_RHI_001323257-59
Tab 180	MS_RHI_001323157-80
Tab 181	MS_RHI_001323152
Tab 182	MS_RHI_001756460-62
Tab 183	MS_RHI_001323156
Tab 184	MS_RHI_003062315-16
Tab 185	MS_RHI_001422949-53

Tab 186	MS_RHI_000557922
Tab 187	MS_RHI_002427430-31
Tab 188	MS_RHI_002434427
Tab 189	MS_RHI_002431472
Tab 190	MS_RHI_001402826
Tab 191	MS_RHI_002403505
Tab 192	MS_RHI_000904091-96
Tab 193	MS_RHI_000979001-02
Tab 194	MS_RHI_003110795-98
Tab 195	MS_RHI_002048847
Tab 196	MS_RHI_002648279
Tab 197	MS_RHI_000658064
Tab 198	MS_RHI_000658071
Tab 199	MS_RHI_002648661-62
Tab 200	MS_RHI_000658217-18
Tab 201	MS_RHI_002739508
Tab 202	MS_RHI_002291624-28
Tab 203	MS_RHI_002758176-77
Tab 204	MS_RHI_000626702-03
Tab 205	MS_RHI_002467092
Tab 206	MS_RHI_003040814-15
Tab 207	MS_RHI_001770016-17
Tab 208	MS_RHI_002755095-96
Tab 209	MS_RHI_002755287
Tab 210	MS_RHI_000575050-102
Tab 211	MS_RHI_002739514-18
Tab 212	MS_RHI_002570054
Tab 213	MS_RHI_002562586-88
Tab 214	MS_RHI_002562593-96
Tab 215	MS_RHI_002569995-99
Tab 216	MS_RHI_002573087-91

Tab 217	MS_RHI_002300823-26
Tab 218	MS_RHI_002491291
Tab 219	MS_RHI_001817697-98
Tab 220	MS_RHI_002689034
Tab 221	MS_RHI_000631156-57
Tab 222	MS_RHI_000667439-41
Tab 223	MS_RHI_000669836-37
Tab 224	MS_RHI_001144323-28
Tab 225	MS_RHI_000948117-20
Tab 226	MS_RHI_000948121-25
Tab 227	MS_RHI_002522182-83
Tab 228	MS_RHI_002683309-10
Tab 229	MS_RHI_001445300-01
Tab 230	MS_RHI_000663146-50
Tab 231	MS_RHI_001107061-68
Tab 232	MS_RHI_000661625-26
Tab 233	MS_RHI_001445631-32
Tab 234	MS_RHI_000675053-55
Tab 235	MS_RHI_000672586-87
Tab 236	MS_RHI_000675138-39
Tab 237	MS_RHI_000675610-11
Tab 238	MS_RHI_000673454-55
Tab 239	MS_RHI_003336444-46
Tab 240	MS_RHI_000914444-45
Tab 241	MS_RHI_001388242-44
Tab 242	MS_RHI_000683798-800
Tab 243	MS_RHI_000683909-11
Tab 244	MS_RHI_002931697
Tab 245	MS_RHI_001847750
Tab 246	MS_RHI_003022274-75
Tab 247	MS_RHI_000915774-75

Tab 248	MS_RHI_001203154-64
Tab 249	MS_RHI_000671363-64
Tab 250	MS_RHI_001107058-60
Tab 251	MS_RHI_002317310-11
Tab 252	<i>ADCB</i> Plaintiffs' Deposition Exhibit 52 (Rosa, November 18, 2009)
Tab 253	MS_000272610-11
Tab 254	IKB000071956
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Tab 256	Plaintiffs' Deposition Exhibit 404 (Drennan, December 8, 2011)
Tab 257	MS_RHI_000088964-69
Tab 258	Plaintiffs' Deposition Exhibit 426 (Wallis, November 30, 2011)
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Tab 260	Plaintiffs' Deposition Exhibit 405 (Drennan, December 8, 2011)
Tab 261	Plaintiffs' Deposition Exhibit 410 (Drennan, December 8, 2011)
Tab 262	Excerpts from the Deposition Transcript of Gregg Drennan taken on February 28, 2011 in <i>ADCB</i>
Tab 263	Morgan Stanley ABS Capital I Inc. Form 8-K , dated June 30, 2004
Tab 264	MS_000137616-51
Tab 265	MS_000597348-49
Tab 266	"Howie Hubler of New Jersey: The Return of a Subprime Villain," <i>N.Y. Observer</i> , Mar. 24, 2010
Tab 267	Daniel Gross, "Eve of Destruction," <i>N.Y. Times</i> , Apr. 18, 2010
Tab 268	MS_RHI_000123021-25
Tab 269	MS_RHI_000353319
Tab 270	IKB003751689
Tab 271	MDYS RHNB 050285-89
Tab 272	Plaintiffs' Deposition Exhibit 347 (Katugampola, November 18, 2011)
Tab 273	MS_RHI_000086226-27
Tab 274	Transcript of September 11, 2012 hearing in <i>ADCB</i>
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Tab 276	IKB_H0000000917-69

Tab 277	<i>ADCB</i> Plaintiffs' Deposition Exhibit 619 (Mallinson, July 15, 2011)
Tab 278	<i>ADCB</i> Plaintiffs' Deposition Exhibit 257 (Drennan, February 28, 2011)
Tab 279	Excerpts from the Deposition Transcript of Bernd Claussen taken on November 10, 2011
Tab 280	Excerpts from the Deposition Transcript of Henry Tabe taken on March 9, 2011 in <i>ADCB</i>
Tab 281	<i>ADCB</i> Plaintiffs' Deposition Exhibit 336 (Tabe, March 9, 2011)
Tab 282	<i>ADCB</i> Plaintiffs' Deposition Exhibit 684 (Kirnon, July 28, 2011)
Tab 283	MDYS ADCB 994635-72
Tab 284	<i>ADCB</i> Plaintiffs' Deposition Exhibit 515 (Jordan, April 20, 2011)
Tab 285	<i>ADCB</i> Plaintiffs' Deposition Exhibit 347 (Khakee, March 16, 2011)
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Tab 287	Excerpts from the Deposition Transcript of Kenneth Guy taken on November 7, 2011
Tab 288	Excerpts from the Deposition Transcript of Kenneth Guy taken on February 9, 2010 in <i>ADCB</i>
Tab 289	Excerpts from the Deposition Transcript of Michael Errol Smith taken on December 13, 2011
Tab 290	Excerpts from the Deposition Transcript of Ronald Foresman taken on November 29, 2011
Tab 291	Excerpts from the Deposition Transcript of Ron Foresman taken on February 1, 2012
Tab 292	Defendants' Deposition Exhibit 148 (Foresman, February 1, 2012)
Tab 293	Excerpts from the Deposition Transcript of David V. Sommers taken on January 31, 2012
Tab 294	Defendants' Deposition Exhibit 92 (Foresman, November 29, 2011)
Tab 295	Defendants' Deposition Exhibit 89 (Foresman, November 29, 2011)
Tab 296	Defendants' Deposition Exhibit 93 (Foresman, November 29, 2011)
Tab 297	MS_RHI_000125833-34
Tab 298	Plaintiffs' Deposition Exhibit 425 (Drennan, December 8, 2011)
Tab 299	Excerpts from the Deposition Transcript of Amrit Bains taken on June 29, 2011
Tab 300	Plaintiffs' Deposition Exhibit 33 (Bains, June 29, 2011)
Tab 301	IKB000092603-04

Tab 302	IKB000062496-97
Tab 303	IKB000013105
Tab 304	S&P-ADCB 0094533-35
Tab 305	Excerpts from the Deposition Transcript of Amrit Bains taken on June 30, 2011
Tab 306	Defendants' Deposition Exhibit 34 (Scott, November 29, 2011)
Tab 307	Plaintiffs' Deposition Exhibit 4 (Bains, June 29, 2011)
Tab 308	IKB000004902
Tab 309	Plaintiffs' Deposition Exhibit 288 (Guadagnuolo, November 17, 2011)
Tab 310	MS_RHI000038711-885
Tab 311	MS_RHI_000015328-33
Tab 312	IKB000106711-27
Tab 313	IKB003623089-102
Tab 314	Plaintiffs' Deposition Exhibit 35 (Bains, June 29, 2011)
Tab 315	MDYS ADCB 735195-272
Tab 316	David Fiderer, "The Panic of 2007 and Blind Faith in Fatally Flawed AAA Ratings", OpEdNews.com (September 20, 2012)
Tab 317	Plaintiffs' Deposition Exhibit 344 (Katugampola, November 18, 2011)
Tab 318	Plaintiffs' Deposition Exhibit 101 (Bauknecht, October 13, 2011)
Tab 319	IKB000060088-89
Tab 320	Plaintiffs' Deposition Exhibit 240 (Rhode, November 11, 2011) and its translation
Tab 321	ADCB Plaintiffs' Deposition Exhibit 325 (Tabe, March 9, 2011)
Tab 322	Plaintiffs' Deposition Exhibit 249 (Ryan, November 16, 2011)
Tab 323	Plaintiffs' Deposition Exhibit 427 (Drennan, December 8, 2011)
Tab 324	IKB000055257
Tab 325	Plaintiffs' Deposition Exhibit 439 (Wallis, November 30, 2011)
Tab 326	S&P-IKB 0143140-61
Tab 327	FITCH-RHINE SUPP 0000766-68
Tab 328	FITCH-RHINE 00051613-14
Tab 329	Plaintiffs' Deposition Exhibit 262 (Ryan, November 16, 2011)
Tab 330	Plaintiffs' Deposition Exhibit 367 (Duignan, November 21, 2011)

Tab 331	FITCH-RHINE 00049618-21
Tab 332	Plaintiffs' Deposition Exhibit 461 (Bund, March 21, 2012)
Tab 333	Plaintiffs' Deposition Exhibit 126 (Pinkus, October 21, 2011)
Tab 334	IKB 000819578
Tab 335	FITCH-RHINE 00059421-22
Tab 336	Defendants' Deposition Exhibit 102 (Foresman, November 29, 2011)
Tab 337	IKB003206892-911
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Tab 340	S&P-IKB 0071208-15
Tab 341	FITCH-RHINE 00055567-72
Tab 342	IKB000031875-76
Tab 343	ISL-e0008509
Tab 344	IKB 000829769-70
Tab 345	IKB 000486710-11
Tab 346	MDYS RHNB 050307-10
Tab 347	IKB 001076503-04
Tab 348	IKB000001463
Tab 349	IKB000023353-54
Tab 350	MS_000803832-51
Tab 351	IKB000210593
Tab 352	Plaintiffs' Deposition Exhibit 385 (Moore, November 30, 2011)
Tab 353	FITCH-RHINE SUPP 00000001-3
Tab 354	Plaintiffs' Deposition Exhibit 386 (Moore, November 30, 2011)
Tab 355	FITCH-RHINE 00016661-62
Tab 356	FITCH-RHINE 00007575
Tab 357	FITCH-RHINE 00008565
Tab 358	FITCH-RHINE 00051782-84
Tab 359	FITCH-RHINE 00012057-58
Tab 360	FITCH-RHINE 00015582-83
Tab 361	FITCH-RHINE 00030651-65

Tab 362	FITCH-RHINE 00002333-45
Tab 363	FITCH-RHINE SUPP 00000543-631
Tab 364	Plaintiffs' Deposition Exhibit 466 (Bund, March 21, 2012)
Tab 365	Plaintiffs' Deposition Exhibit 462 (Bund, March 21, 2012)
Tab 366	S&P-ADCB 0176922-29
Tab 367	Plaintiffs' Deposition Exhibit 464 (Bund, March 21, 2012)
Tab 368	FITCH-RHINE 00015758-59
Tab 369	FITCH-RHINE 00067521-24
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Tab 373	FITCH-RHINE 00119980-84
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Tab 380	Defendants' Deposition Exhibit 120 (Moore, November 30, 2011)
Tab 381	FITCH-RHINE 00053668
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Tab 385	IKB000005910
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Tab 387	IKB001595166
Tab 388	FITCH-RHINE 00047568
Tab 389	Plaintiffs' Deposition Exhibit 460 (Bund, March 21, 2012)
Tab 390	FITCH-RHINE 00049732-34
Tab 391	FITCH-RHINE 00049633
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Tab 393	FITCH-RHINE 00050412-19
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Tab 397	Plaintiffs' Deposition Exhibit 387 (Moore, November 30, 2011)
Tab 398	Defendants' Deposition Exhibit 129 (Smith, December 13, 2011)
Tab 399	MS_001349252
Tab 400	MS_RHI_000120457-58
Tab 401	MS_RHI_000606275-324
Tab 402	MS_RHI_000609577-622
Tab 403	MS_RHI_000625824-25
Tab 404	MS_RHI_000697138
Tab 405	MS_RHI_000828562-66
Tab 406	MS_RHI_000835269-72
Tab 407	MS_RHI_000851786-89
Tab 408	MS_RHI_000898556-59
Tab 409	MS_RHI_000914437-43
Tab 410	MS_RHI_000991786-833
Tab 411	MS_RHI_001404362
Tab 412	MS_RHI_001404737-74
Tab 413	MS_RHI_001476823-27
Tab 414	MS_RHI_002105460-62
Tab 415	MS_RHI_002434428
Tab 416	MS_RHI_002933948-4043
Tab 417	MS_RHI_002935259
Tab 418	MS_RHI_002935327-28
Tab 419	MS_RHI_002935330
Tab 420	MS_RHI_002937101-02
Tab 421	MS_RHI_002937472-73
Tab 422	MS_RHI_002937525-30
Tab 423	MS_RHI_002937555-617

Tab 424	MS_RHI_002941609-36
Tab 425	Plaintiffs' Deposition Exhibit 348 (Katugampola, November 18, 2011)
Tab 426	KC0009682

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 10th day of October, 2012, at San Diego, California.

s/ DANIEL S. DROSMAN

DANIEL S. DROSMAN

CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2012, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 10, 2012.

s/ DANIEL S. DROSMAN
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